

CONGOLEUM CORPORATION
Passaic River Study Area
Evidence Summary
Submitted by Chemical Land Holdings, Inc.
June 11, 1997

Congoleum Corporation

CLH has reviewed the Congoleum correspondence to EPA regarding its 104(e) response and has noted that the correspondence, dated January 20 and February 5, 1997, is non-responsive. In addition, CLH has noted that although Congoleum acknowledges that its response was due January 27, 1997, it makes no commitment in respect to a date certain by which it will complete its response. CLH brings this to EPA's attention because, as we have indicated in the past, it is vital for EPA to evaluate the potential liability of others as part of its overall strategy with respect to cooperating with EPA on the Study Area matter.

A. Discharges to the Passaic:

- Although to date the Region has not received any substantive material from Congoleum that is responsive to the Region's 104(e) letter, CLH has a 1971 schematic drawing obtained from the PYSC that shows an indirect discharge pipe extending from Congoleum Building 15 to the Passaic River. (See Attachment A.) In addition, the attached copy of a letter from a former leader and pipe fitter employed at Congoleum Building 15 from 1926 - 1974, describes the regular course of equipment cleaning and maintenance work in Building 15. (See Attachment B.) This work involved the use of solvent degreasers that were regularly used to clean machinery and equipment, and that runoff from those machine cleaning operations flowed into floor drains. In addition, Mr. Ross states that floor drains connected via a large pipe that discharged directly into the river.
- The Congoleum facility was connected to the Bergen Ave., Nairn Ave., and Marchmont LSO districts. Multiple correspondence between PYSC and Congoleum ranging from 1926 to 1950 describes repeated sewer overflow episodes relating to Congoleum's operations. (See Attachment C.)

B. Hazardous Substances Were Used On-Site:

- Although to date the Region has not received any substantive material from Congoleum that is responsive to the Region's 104(e) letter, CLH has obtained from Congoleum product catalogues, correspondence with PYSC, Congoleum reports, media articles, and other independent records, and interviews with former Congoleum employees. These sources provide a substantial body of information regarding hazardous substances used in Congoleum's manufacturing processes. Included among these substances are acetone, benzene, lead, toluene,

trichloroethylene, xylene, and oils (TEPH). (See Attachments B and D.)

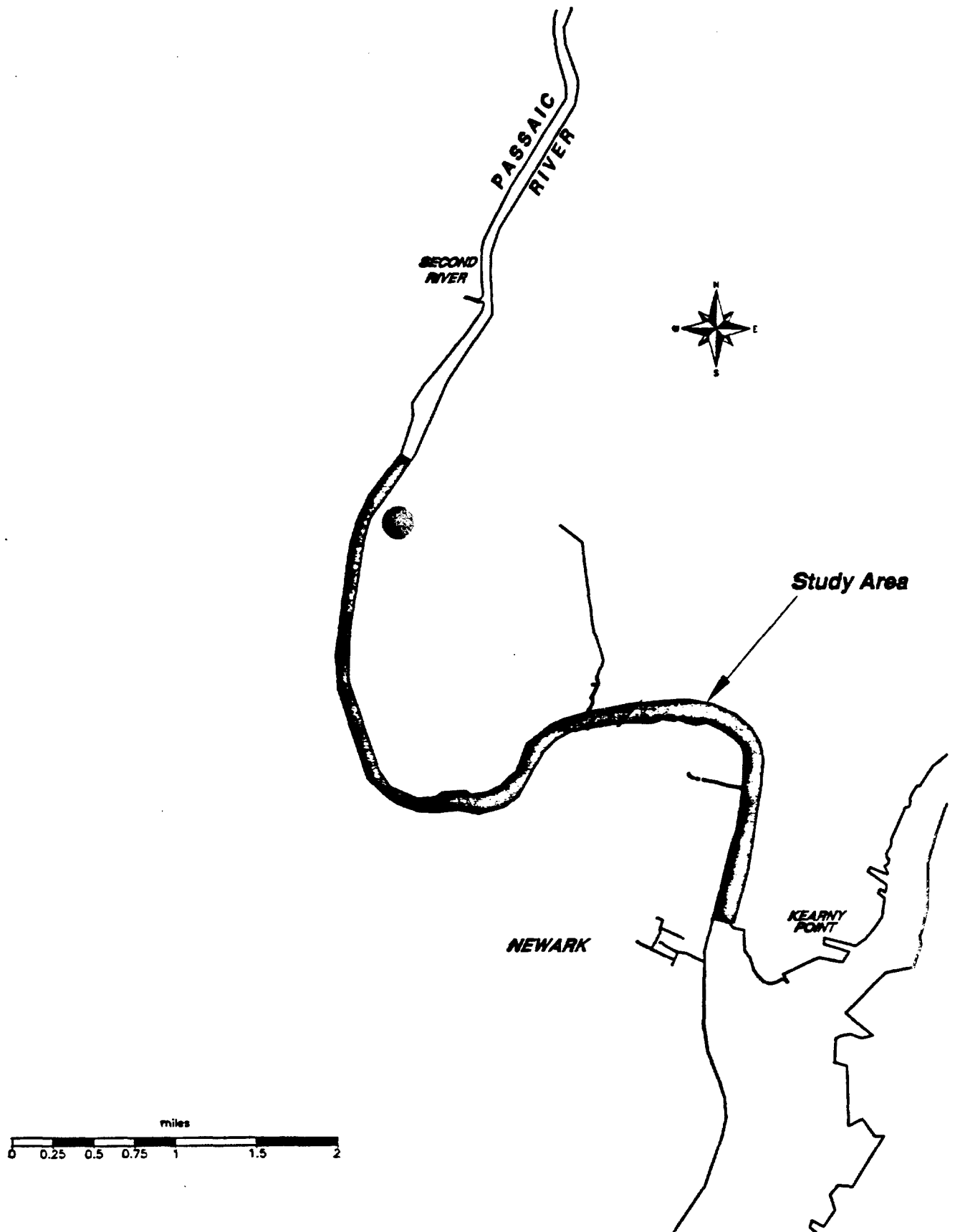
C. Hazardous Substances Used On-Site have Impacted River Sediments:

- As part of CLH's performance of the remedial investigation/feasibility study (RI/FS) for the Six Mile Study Area (Study Area), CLH has taken and analyzed sediment samples from locations adjacent to the former Congoleum Nairn facility. Among the hazardous substances found in the sediments were acetone, benzene, toluene, xylene and TEPH. (See Analytical Data Summary Tables Passaic River Study Area Remedial Investigation dated April 1996.)

D. Responsible Corporate Entity

- In Congoleum's February 5, 1997 letter to EPA, Congoleum concedes that "Predecessors of Congoleum owned and operated a flooring manufacturing facility in Kearny, New Jersey..."
- Correspondence should be sent to: Congoleum Corporation
3705 Quakerbridge Road
P.O. Box 3127
Mercerville, NJ 08109

Congoleum Corp.



A

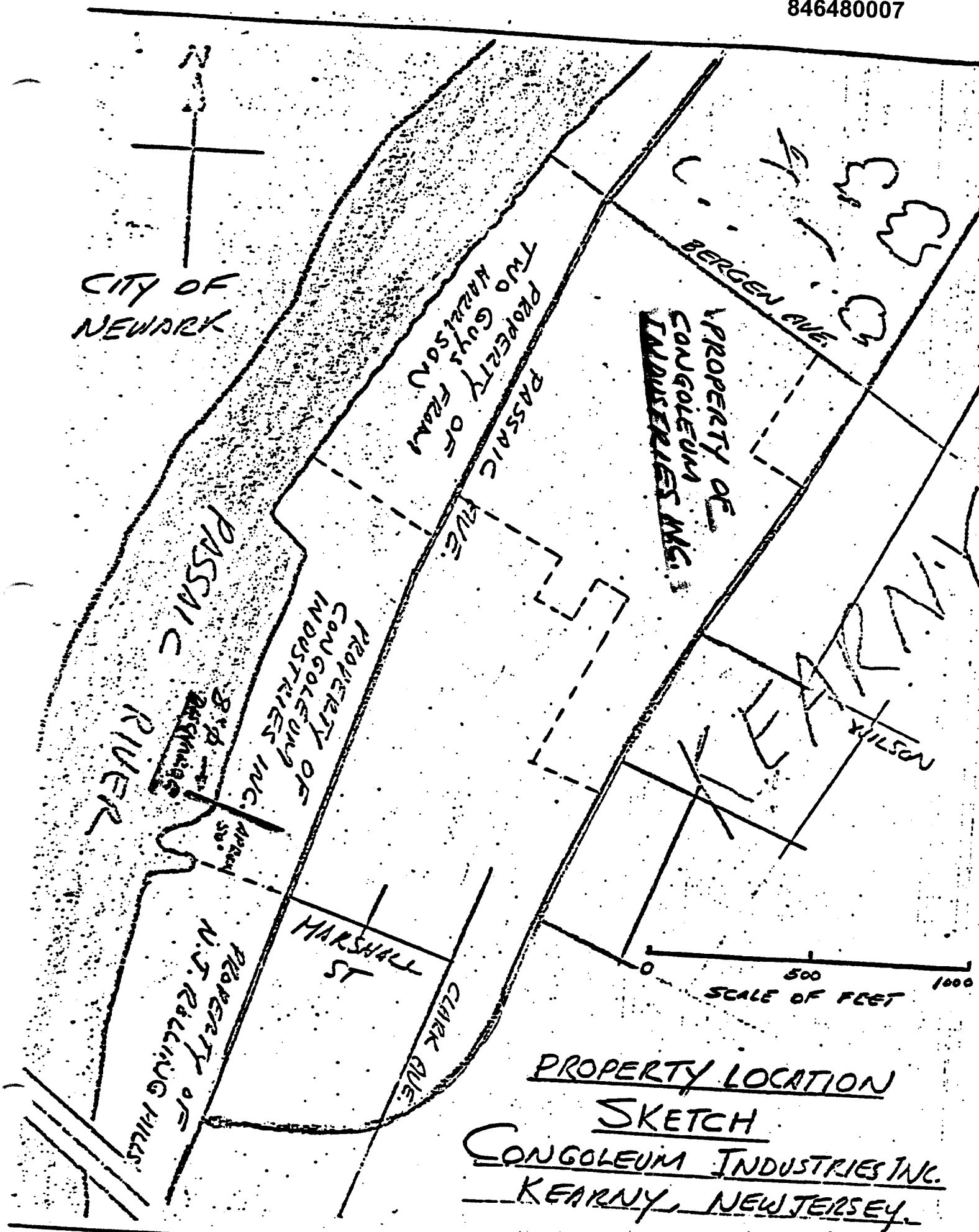
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1971 Congoleum Building # 115 Schematic Drawing

- Documents direct discharge pipe emanating from Congoleum Building # 115 to the Passaic River

DAL02:71890.1

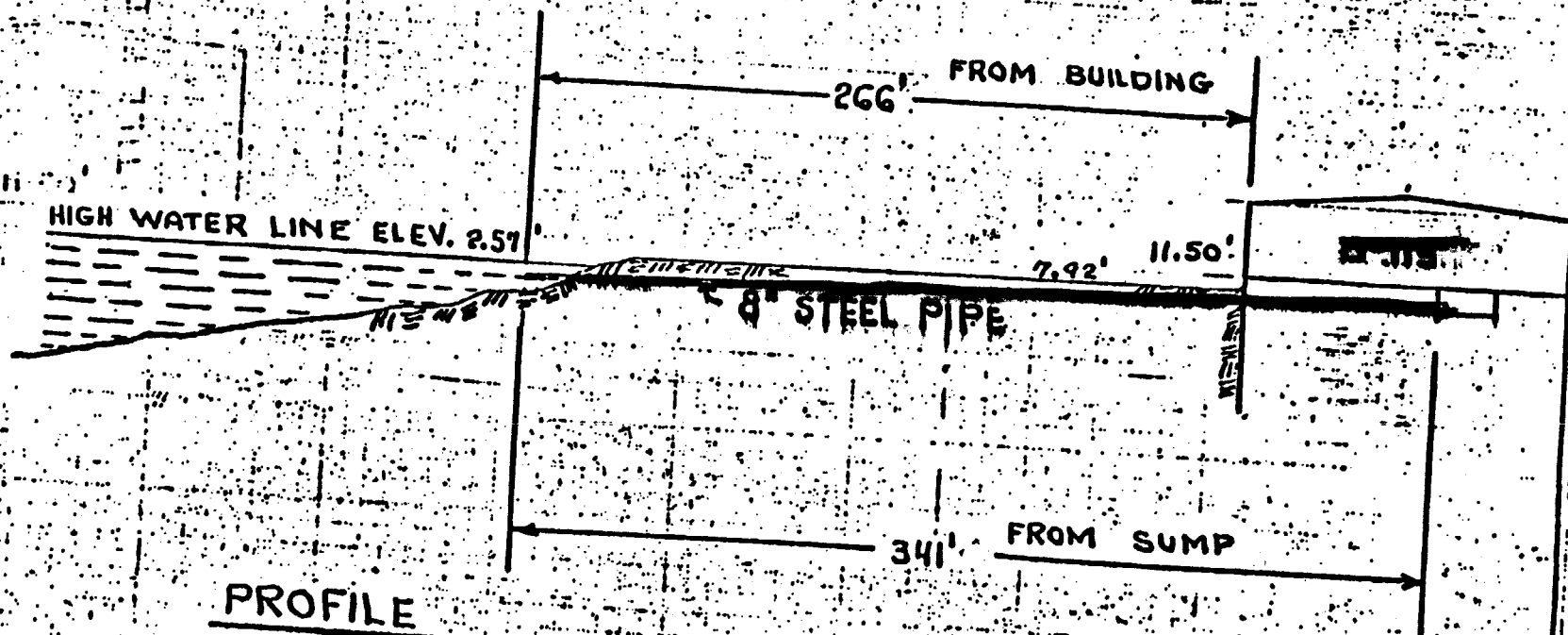
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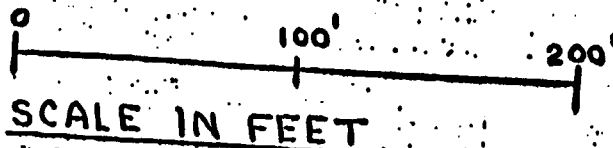
OCT. 28, 1971

PROPERTY OF: CONGOLEUM INC.
KEARNY, N.J.

SHEET 2 OF 2



PROFILE
(ELEV. LOOKING NORTH)



846480008

B

846480009

Affidavit of Daniel Ross

- Establishes products, raw materials, solvent usage, operations and discharge mechanism to the Passaic River

AFFIDAVIT OF DANIEL ROSS

STATE OF NEW JERSEY

§
§
§

COUNTY OF ESSEX

Daniel Ross, upon his oath deposes and says:

1. I, Daniel Ross, am a former employee of Congoleum Corporation and its predecessor Congoleum-Nairn, Incorporated (hereafter "Congoleum") at the linoleum, tile and flooring products manufacturing facility ("Congoleum facility") formerly located at 195 Belgrove Drive in Kearny, Hudson County, New Jersey.
2. I was employed at the Congoleum facility from circa 1936 to 1976. During this time I held the position of a Crew Leader and Pipefitter. Throughout my employment, I had the opportunity to work in a number of areas within the facility.
3. Because of my position as a Crew Leader and Pipefitter, I became very knowledgeable of certain manufacturing operations, process infrastructure and waste management practices historically in-place at the Congoleum facility.
4. I recall that a container of a very strong acid was located at the northern end of Building #8. I can not recall the name of this strong acid. This container of strong acid had a fill pipe leading into it and another pipe in the bottom of the container.
5. The spent acid from this container at Building #8 was not drummed but went into some type of drain.
6. Kerosene, Varsol and other similar solvents were utilized in the cleaning of various machines, such as calendars, banberry mixers, sheeters and scratchers, at the Congoleum facility. These machines would first be scraped clean and then rinsed down with kerosene, Varsol or other solvents.
7. It is my first hand knowledge that run-off from machine cleaning operations performed in all of the processing buildings at the Congoleum facility would flow into floor drains located in those processing buildings.
8. Large amounts of asbestos, as well as pigments and cement were utilized in asphalt tile production operations carried out in Building #115.
9. Run-off from process machine cleaning operations performed in Building #115 flowed into floor drains located in that building.

Daniel F. Ross

846480011

AFFIDAVIT OF DANIEL ROSS - PAGE 2

10. The floor drains located in Building # 115 at the Congoleum facility were routed into a large pipe which discharged to the Passaic River.

11. I do not recall if the floor drains in the other processing buildings at the facility also discharged to the river.

Sworn to before me this 5
day of March, 1997

Daniel F. Ross
Daniel Ross

Michael W. Boyle
Notary Public

State Of New Jersey
Notary Public Commission
Michael W. Boyle
My Commission Expires 10/31/00
Notary ID# 2038395

C

846480013

March 11, 1926 Correspondence from Congoleum to PVSC

- Documents discharge of sewage from Congoleum to the Passaic River

DAL02:71890.1

846480014

U O P I.

CONGOLEUM-NAIRN, INC.

179 Balgrove Drive,
Easton, N.J.

March 21, 1978.

Passaic Valley Sewerage Commissioners,
84 Branford Place,
Newark, N.J.

Attention Mr. Frederic M. P. Pearse.

Dear Sir:

We duly received your letter of March 22nd regarding the removal of our sewerage from the Passaic River.

I wish to advise that, for some time we have been working on this problem and hope within a very few days to be able to submit to the Engineers of the Commission a plan which will meet with their approval.

In view of this, we trust you will grant us such extension, after April 1st, as may be reasonable to permit us to complete the work.

Yours very truly,

CONGOLEUM-NAIRN INC.

(Signed) R.M. Taylor,

Plant Manager.

Recommend extension

April 30, 1928 PVSC Report of Sources of Pollution to the Passaic River

- Documents discharge of sewage from Congoleum to the Passaic River

sent to Mr. Van Dwyne

PVSU

April 30, 1928.

Mr. J. Ralph Van Dwyne,
Chief Engineer,
Passaic Valley Sewerage Commission,
Newark, N.J.

Dear Sir:-

The following is a list, very complete, of sources
of pollution:-

TOWN SEWERS.

Bloomfield.

Sanitary sewer at Glenwood and Llewelyn Aves frequently
overflows manhole and runs into Second River.

Sanitary sewer in Watsessing Park at Roosevelt Avenue broken
sewage constantly escaping to Second River.

Storm sewer at Franklin Street bridge discharges chemical
industrial wastes to Second River.

Storm sewer at Glenwood Avenue and Llewelyn Avenue discharges
sanitary sewage to Second River.

Storm sewer at Farrand Street, discharges acid wastes to
Toney's Brook, tributary to Second River.

Meadowbrook culvert discharges laundry and chemical wastes
to Meadow Brook, tributary to Second River.

Belleville.

Sanitary sewer east of Belwood Park depot continually discharging
sewage to Second River.

Sanitary sewer from Belwood Park section, north of Erie R.R.,
continuously discharging sewage to Second River.

Sanitary sewer, near Copper Mills, appears broken. Continuous
seepage through wall into Second River.

Storm sewer, foot of Little Street, discharges acid wastes with
heavy red sediment from chemical works.

Storm sewer, foot of Joralemon Street, suspicious discharge at
times.

846480017

Pollutions from industrial plants, Continued.

#6.

Sanitary sewage only, Continued.

Wolfey Jones
**Congoleum Hairn Co.,
Kearny.**

This pollution is caused by the town sewers of Kearny being blocked by sand. The pollution is listed under the name of the firm because the sewage is coming from an outlet of their interception chamber. This firm went to considerable expense and trouble to put in an interception chamber and have given no trouble until recently. This discharge of sewage is caused by the blocking of the town sewer. This matter very thoroughly and we do not want help from them.

Pollutions from industrial waste only.

There are at least 6 factories in Bloomfield which send polluting wastes to the rivers through the storm sewers of Bloomfield. As has been reported before, these pollutions should be referred to the town as it has been the policy to connect industrial wastes to the storm sewers. Some of these plants are a mile away from the river and it is hardly fair to list them as polluters under the circumstances.

City Stables, East Orange.

They are very careless about spilling road oil around this yard. The oil escapes down a surface drain to Second River. This has been called to their attention several times.

**Miner-Edgar Alcohol Co.,
Newark.**

Pollution from suspension of Calcium Sulphate in Sulphuric Acid not been abated. Now in hands of receiver but not operating by recent reports.

**General Chemical Co.,
Amalgamated Dyestuff and
Chemical Co., Newark.**

Wastes have been segregated and polluting matter put down a deep well as temporary expedient. Samples indicate that trouble has not been eliminated, but would appear to have been reduced.

**North Essex Brick Layer Co.,
Montclair.**

**Concrete Industrial Co.,
formerly Fairlawn Sand Co.
Fairlawn.**

Only operate in Summer. This year they are going to settle sand before discharge to river.

**Flintkote Co.,
East Rutherford.**

In spite of changes made, much oil escapes to creek in time of storm. Also finely ground mica. This is because of drainage situation in this section.

**Hanlon, Goodman, Co.,
291 Riverside Ave.,
Newark.**

A discharge, increasing in amount, has appeared from this plant. It consists of soapy water which has been used for washing brushes.

**National Grain Yeast Co.,
800 Mill St. Belleville.**

Polluting discharge from yeast mash.

846480018

October 24, 1947 PVSC Report on Stream Contaminations During September, 1947

- Documents discharge of sewage from Congoleum to the Passaic River due to a partially clogged town sanitary sewer

October 24, 1947.

**The Passaic Valley Sewerage Commissioners,
24 Branford Place,
Newark 2, New Jersey.**

Gentlemen:- Stream Contaminations during September, 1947.

Departures from normal in the quality of the allowable liquids which are discharged to the streams within the drainage area under the jurisdiction of the Passaic Valley Sewerage Commissioners, occur from time to time. Such variations are caused mostly by disturbances in purification processes which are under precise control, or through the breaking, clogging, leaking of sewers and pipelines, and the failures or breakdowns of pumps, filters or other mechanical purification devices.

Most frequently these stream contaminations are caused by unavoidable accidents, occasionally by carelessness and rarely by wilful intent. They are usually discovered promptly and the necessary remedies, repairs or adjustments quickly applied.

Such temporary contaminations of the waters of the streams during September, 1947, together with the means of correction applied, are described briefly in the following list:-

September 3. Federal Textile Processing Co., 85-5th Ave., Paterson. Industrial sewer in rear of this plant overflowed and discharged dye waste into the Passaic River. Our inspector had them clean out the sewer line and remove a blockage therefrom. This eliminated the violation promptly.

September 4. Congoleum-Nairn Inc., 195 Belgrove Drive, Kearny. Our Line Superintendent brought in a sample of oil which he had obtained from the Kearny sanitary sewer near Bergen Avenue. The oil proved to be good fresh fuel oil. River inspector traced the source of the fuel oil to the engine room of the Congoleum-Nairn plant where it was found that a valve had been left open and considerable amounts of fuel oil had drained to the sanitary sewer. Closing of the valve stopped the loss of fuel oil to the sanitary sewer. In connection with this matter our inspector further found that a small amount of the fuel oil had reached the Passaic River through a storm sewer by intermittent overflow from the partly clogged Kearny sanitary sewer. The inspector notified the Kearny sewer department to clean out the sanitary sewer in order to prevent further overflows.

September 8. United Piece Dye Works, Lodi, N. J. Dye waste discharging into Saddle River from the mill pumping station. Our inspector found that one

January 26, 1950 PVSC Report on Stream Contaminations During November and December 1949

- Documents discharge of sewage from Congoleum to the Passaic River due to an overloaded sewer chamber

January 26, 1950.

**The Passaic Valley Sewerage Commissioners,
24 Branford Place,
Newark 2, New Jersey.**

Gentlemen:- Stream Contaminations during November, and December, 1949.

Departures from normal in the quality of the liquids discharged to the streams which are under the jurisdiction of the Passaic Valley Sewerage Commissioners, and other features of potential temporary contaminations of the streams, together with the means of correction applied, are described briefly in the following list:-

November 8, ROCHESTER LAKE WASTE DISPOSAL PLANT.

This plant is overloaded and the operator finds it necessary to by-pass incompletely treated sewage into Saddle River almost every day.

November 9, CONSOLIDATED LIQUOR, INC., LEARNY.

Sanitary sewer overflows to Passaic River caused by overloaded sewer chamber. This condition will continue until some changes are made so that the waste coming from the plants 24" line can enter a line large enough. The present line connecting the chamber to the Learny Sanitary Sewer is only 9".

November 10, THURGOOD HOWE and STERN, 143-145 RIVER ST., PATTERSON.

Our inspector reports that the tenants of this building are throwing refuse into Passaic River and his inspections report the banks of the River are littered with rubbish.

November 10, ALVIN TRUCKING CO., STATE HIGHWAY 217, IARDEN.

A trailer truck belonging to the above company had an accident when the axle on the truck broke causing a hole to be punctured into the tank compartment. This allowed a small amount of fuel oil to escape which drained into Passaic River, as the accident happened Passaic Avenue, Learny. The Learny fire department assisted in cleaning up the surface oil and very little reached Passaic River.

November 23, BRIGHT BOWLING ALLEY, PASSAIC AVENUE, DULI.

Tenants of this building have thrown all their refuse (sweepings, old papers, cartons, steel wool from floor waxing machines, etc.) on the bank and into Saddle River. Our inspector after several visits had the owner clean up this refuse.

846480022

- EXCERPT RE-TYPED FROM ATTACHED ORIGINAL -

January 26, 1950

The Passaic Valley Sewerage Commissioners,
26 Branford Place
Newark 2, New Jersey

Gentlemen:- Stream Contaminations during November, and December, 1949.

Departures from normal in the quality of the liquids discharged to the streams which are under the jurisdiction of the Passaic Valley Sewerage Commissioners, and other features of potential temporary contaminations of the streams, together with the means and correction applied, are described briefly in the following list:-

November 9,

CONGOLEUM-NAIRN, INC., KEARNY

Sanitary sewer overflows to Passaic River caused by overloaded sewer chamber. This condition will continue until some changes are made so that the waste coming from the plants 24" line can enter a line large enough. The present line connecting the chamber to the Kearny sanitary sewer is only 9".

D

846480024

May 2, 1945 Handwritten Notes Obtained From Kearny Fire Department

- Documents hazardous substances utilized at Congoleum including trichloroethylene, solvents and coke/tar

Building #303

April 22, 1964

Trichloroethylene. Non flammable.
Vapor turned into water &
runs out window through vent
from washing machine on 1st
floor & drops on a electric
transformer outside on north end
of Building.

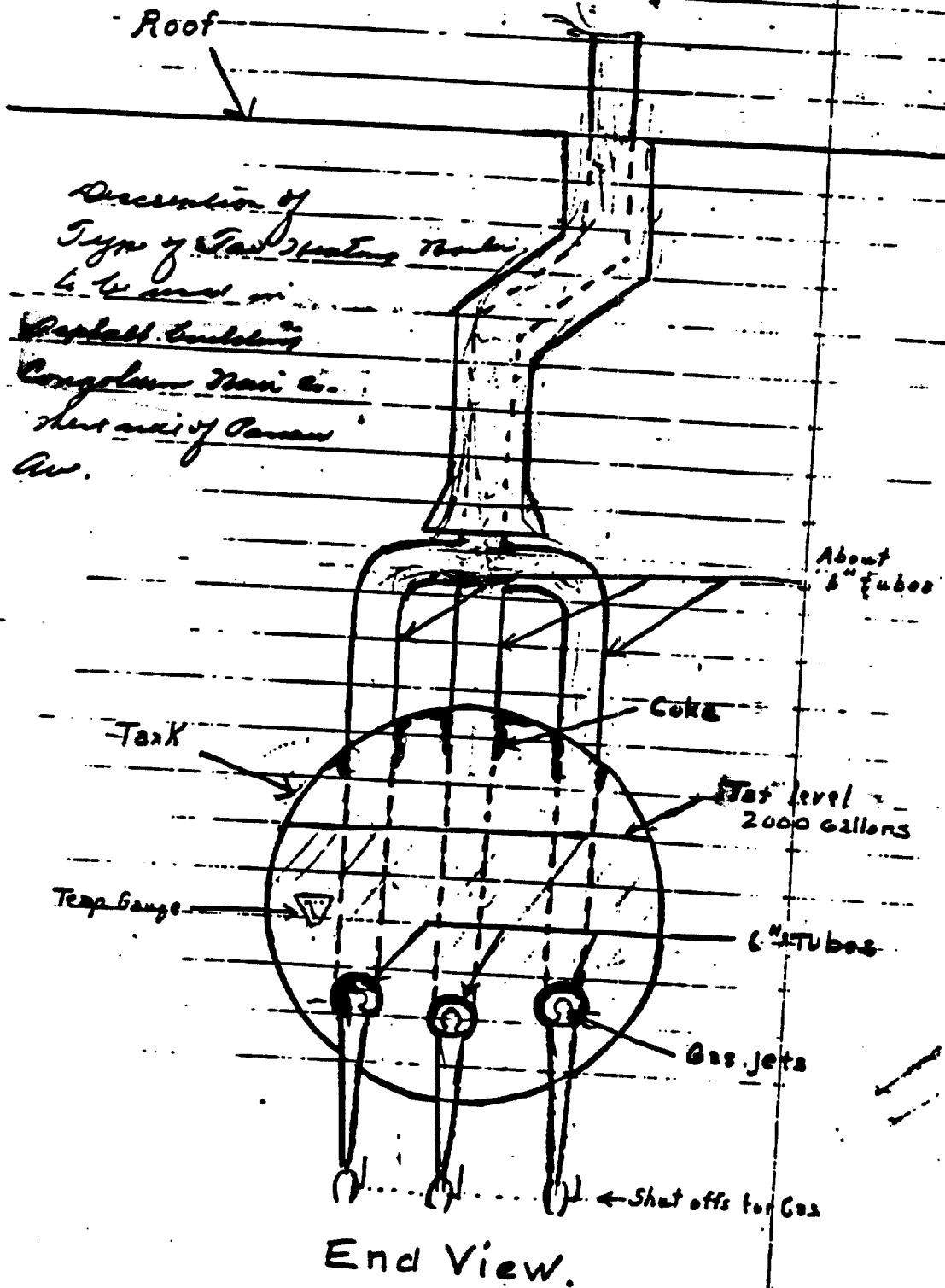
Notified Stewart & Paul of same.
Concrete storage building of solvents
as per plans submitted Nov 11, 1964.
Calsonic spray lights & fixtures
& Tuxton Co. equipment

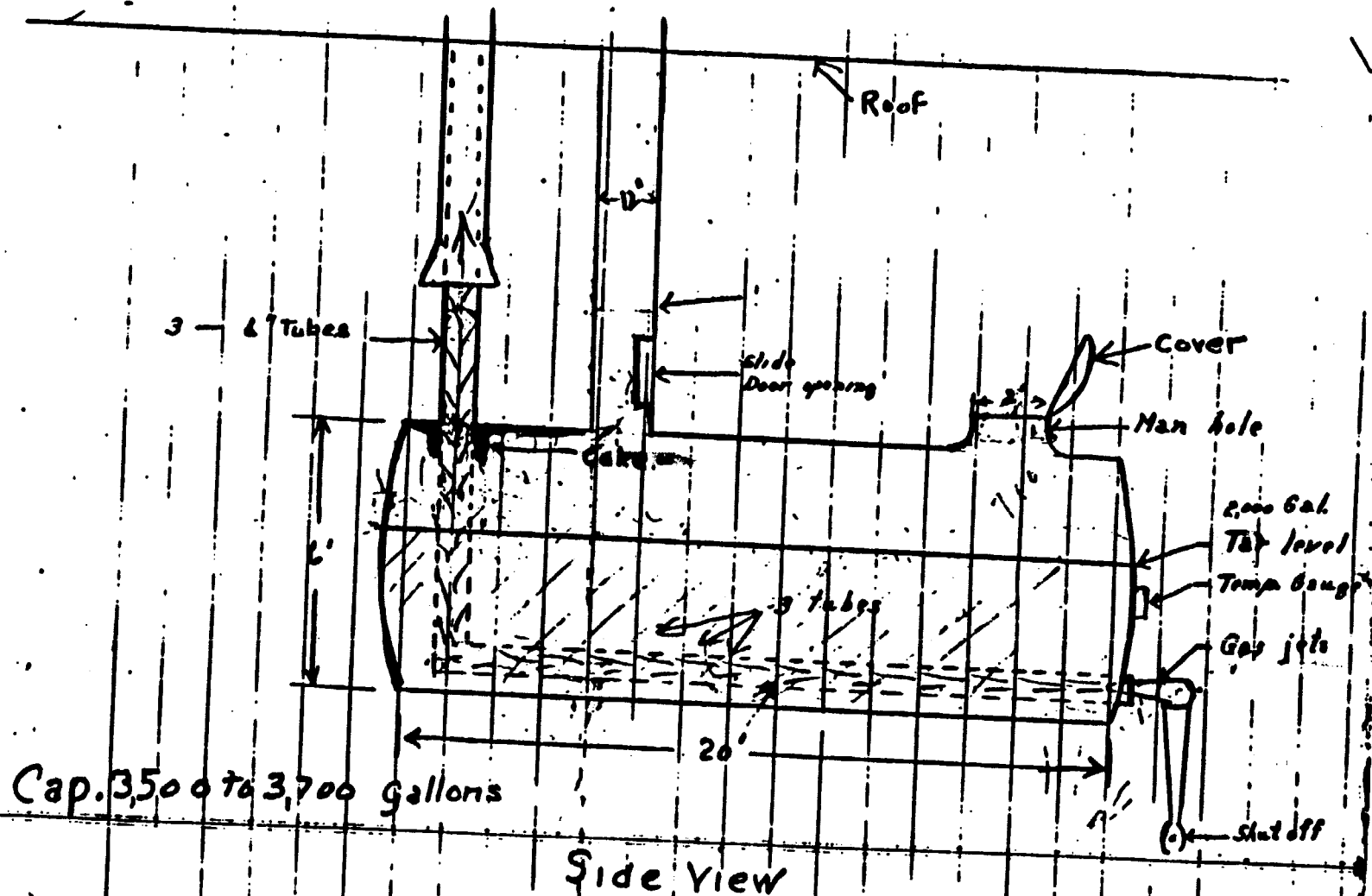
2 spray booth openings, vented
each with permit attached

2 openings for conveyor from
spray room. Spray room
completely enclosed with red
masonry brick

Head position separate floor
area (different departments)

Also checked #24 Bldg. OK.





846480028

April 24, 1956 Handwritten Notes and April 27, 1945 Letter to Congoleum from the Kearny Fire Department

- Documents poor housekeeping practices at Congoleum Building 115 including dumping of oil in weeds adjacent to River and storage of kerosene-saturated flannel outside of Building 31

Handwritten notes at top left, partially illegible.

00003

Supt Rizzolo

April 24 1956

Bldg #37 General Office Condoletum Main
Belmont Dr. Storage of Combustible Material
In the Bottom of the North Stairway Fire Exit.
Also Storage 3rd Floor North Landing Same Stairway
Cigarette Butts Alongside Combustible Materials

Bldg #115 Tile Mes Housekeeping Conditions
Outside Very Poor. South End. Oil Being
Dumped in the Weeds Next to Bldg, River Side.
Damper Control for Fixed C.O.2 System
Inside Duct System Above Mixing Machine
Disconnected at Time of Inspection.

Bldg #23. Sealer Mix. Building, Housekeeping
Very Poor North Side

Bldg #10 And All Elevator Shaftways
Signs Should Be Repainted. Inside And Outside Bldg

Bldg #3A The Floor That Is Saturated
With Kerosene Oil Is Removed From This Bldg
And Stored Outside The Yard Area. This Area
Should Be Cleared Of All Other Combustible
Material.

Henney.

846480030

FIRE HEADQUARTERS
100 KEARNY AVENUE

TELEPHONE KEARNY 2-1400

Department of Fire

THE TOWN OF KEARNY
NEW JERSEY

WILLIAM G. WANDRAS
CHIEF

THOMAS B. BERGEN
CHAIRMAN FIRE COMMITTEE

April 27th, 1955

Mr. Raymond Calice,
Plant Personnel Manager
c/o Congelene-Maine Co.,
Belgrave Drive.,
Kearny, N.J.

Dear Sirs:

From a detail inspection conducted by this department on April 1st to April 25th, we desire to call your attention to conditions which constitutes a Fire Hazard with recommendation for correction.

Building #3 - General Office.

Remove the combustible material from the 3rd floor and at the bottom of the north stairway Fire Exit. Cigarette Butts were found along side of this combustible material.

Building #115 - Tile Mfg.

Housekeeping conditions very poor on south end. Oil being dumped in the weeds next to the building on the River side. Damper control for fixed CO-2 system inside duct system above the mixing machine found disconnected.

Building #23 - Sealer Mixing.

Housekeeping very poor on north side.

Building #10

All elevator shaftways should be properly identified with signs and where there are signs, they are in need of repainting.

Building #31

Remove all the combustible material from the area where the flannel saturated with Kerosene Oil is stored on the outside of the building.

FIRE HEADQUARTERS
109 KEARNY AVENUE
TELEPHONE KEARNY 2-1400

Department of Fire

THE TOWN OF KEARNY
NEW JERSEY

WILLIAM G. WANDRAS
CHIEF

Sheet #2

THOMAS B. BERGEN
CHAIRMAN FIRE COMMITTEE

We shall appreciate your co-operation by your prompt compliance with Fire Department requirements as specified.

If you desire to communicate or discuss this matter further, you may do so by consulting the Superintendent of the Fire Prevention Bureau, 109 Kearny Ave., Kearny, N.J.

Very truly yours,

Superintendent
Fire Prevention Bureau.

846480032

May 31, 1972 PVSC Waste Effluent Survey for Congoleum

- Provides products, operations and utilization of hazardous substances including plasticizers, pigments and oils

Date: May 31, 1972

Plant Ref. No. 1.B.H.O. 861

WASTE EFFLUENT SURVEY

(For Industries Served by the Passaic Valley Sewerage Commissioners)

Plant Name: CONGOLEUM INDUSTRIES, INC., KEARNY PLANT

Address: 160 Passaic Avenue, Kearny, New Jersey Zip 07032

Person and Title to whom any further inquiries should be directed: _____

Phone No.: 991-1000

Number of Employees: 297

Number of Working Days Per Week: Five

Number of Shifts Per Day: One Shift Linoleum -- Two Shifts Tile

Area of Property: 22.3 Acres, or _____ Sq. Ft.

Type of Industry and 4 digit U. S. Standard Industrial Classification No.: SIC 499 3996

Finished Product(s): Vinyl Asbestos Tile, Linoleum, Pastes, Waxes, Adhesives

Average Production: 1971--Tile & Linoleum--4 million sq. y.--Pastes & Wax 800,000 gals.

Raw Materials Used: Vinyl Resins, Plasticizers, Stabilizers, Limestone, Pigments, Oils, Burlap

Brief Description of Operations: Processing of Vinyl Plastics--Blending and Calendering
Operation--Storage of Raw & Finished Goods.

Water received in Gallons (Note: multiply cu. ft. x 7.48)

Purchased water in 1971 from: Town of Kearny, New Jersey

1st Quarter 25,491,000

2nd Quarter 29,662,000

3rd Quarter 31,115,000

4th Quarter 35,690,000

Total Purchased 1971: 121,958,000

Well Water

1st Quarter _____

2nd Quarter _____

3rd Quarter _____

4th Quarter _____

Total well water received in 1971: _____

River Water

1st Quarter 4,500,000

2nd Quarter 4,500,000

3rd Quarter 4,500,000

4th Quarter 4,500,000

Total river water taken in in 1971: 18,000,000

TOTAL OF ALL WATER RECEIVED IN 1971: 139,958,000

Water Use in 1971:

Water to Product (include evaporated and lost water): 70,800,000 Cooling Tower evaporated City water
GALS. PER YEAR

Water to Sanitary Sewer: 32,158,000

Water to Storm Sewer, River or Ditch: 30,000,000

TOTAL WATER USE IN 1971: 132,958,000

Name of River, Stream, or Tributary, and location of storm sewer or ditch outlet to river, stream,
or tributary: Passaic River

846480035

**ANSWER THE FOLLOWING QUESTIONS ONLY IF THE
PLANT WASTE INCLUDES WASTE ATTRIBUTABLE TO INDUSTRIAL OPERATIONS**

(Note: Analyses should be based on a 24-hour composite sample)

Characteristics of Plant Waste discharged to sanitary or combined sewer, after treatment if any. Indicate units of measure where applicable (e.g. Mg/l).

a) pH: _____ b) Turbidity: _____

c) Temperature: _____ d) Radioactive? Yes _____ No _____

e) Solids Concentration:

1) Total Solids _____ Volatile _____ Mineral _____

2) Suspended Solids _____ Volatile _____ Mineral _____

f) Oil and Grease Concentration:

1) Floatable Oils _____

2) Emulsified Oils _____

g) Chlorides _____

h) Chemical Oxygen Demand (C.O.D.): _____

i) 5-day Bio-chemical Oxygen Demand (B.O.D.): _____

j) Total organic carbon (T.O.C.): _____

k) Metallic Ions—Name and concentration (Important—list each metal in waste, e.g., chromium hex. and triv. Antimony, Lead, Mercury, Copper, Vanadium, Nickel; give concentration and total daily discharge of each metal.)

l) Toxic Material—Name and concentration e.g., cyanide salts, etc.): _____

m) Solvents—Name and concentration: _____

n) Resins—Name and concentration (Lacquers, Varnishes, Synthetics): _____

o) Date and time span of sample _____

Explain hours, method of discharge of waste to Sanitary Sewer and peak rate of flow, e.g., (continuing for 8 hours per day, 5 days per week at 100 gal./day rate) (batch twice a day for 20 minutes at 100 gal./min.) (Continuous 24 hours steady or with peaks at 2 P.M., peak rate 5 M.G.D.) etc.

Characteristics of Plant Discharge to Storm Sewer, River, or Ditch, after treatment if any. Indicate units of measure where applicable (e.g., Mg/l).

a) pH: 6.9 b) Turbidity: _____

c) Temperature: Max. 80° F d) Radioactive? Yes _____ No x

e) Solids Concentration: _____

1) Total Solids 48 ppm Volatile 22 Mineral 26

2) Suspended Solids 3 ppm Volatile _____ Mineral _____

f) Oil and Grease Concentration: _____

1) Floatable Oils _____

2) Emulsified Oils _____ Less than 1 ppm

g) Chlorides 46 ppm

h) Chemical Oxygen Demand (C.O.D.): 12 ppm

i) 5-day Bio-chemical Oxygen Demand (B.O.D.): 6 ppm

j) Total Organic Carbon (T.O.C.): 8 ppm

k) Metallic Ions—Name and concentration (Important—list each metal in waste, e.g., chromium hex. and triv. Antimony, Lead, Mercury, Copper, Vanadium, Nickel; give concentration and total daily discharge of each metal.):

None

l) Toxic Material—Name and concentration (e.g., cyanide salts, etc.):

None

m) Solvents—Name and concentration: _____

None

n) Resins—Name and concentration (Lacquers, Varnishes, Synthetics): _____

None

o) Date and time span of sample: 1/23/72 — Three samples composited into one.

Do you pretreat any waste before discharge? No

If so, describe process and disposal of residue removed: _____

Certification of Laboratory doing sampling and making analyses shall be given. Procedures shall be those shown in the 13th edition of Standard Methods for the Examination of Water and Wastewater, where applicable. If no procedure is applicable, the laboratory is to describe method and procedure used in analyses.

Analysis and sampling through
Betz Environmental Engineer, Inc.
Betz Laboratories, Inc.
Trevose, Pa.

Joseph R. [Signature] Master Mechanic
Signature and title of person preparing report

846480037